

Caitrin Una McKiernan, Esq.  
FRESHFIELDS BRUCKHAUS DERINGER US LLP  
601 Lexington Avenue, 31st Floor  
New York, NY 10022  
Telephone: (212) 277-4000  
Facsimile: (212) 277-4001

Attorneys for Shield Securities Limited

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----	X	
	:	
In re:	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS, INC., <i>et al.</i> ,	:	Case No. 08-13555 (JMP)
	:	
Debtors	:	
	:	
-----	X	
	:	
LEHMAN BROTHERS SPECIAL FINANCING INC.,	:	
	:	
Plaintiff,	:	
-against-	:	Adversary Proceeding
	:	No. 10-03547 (JMP)
BANK OF AMERICA NATIONAL ASSOCIATION,	:	
<i>et al.</i> ,	:	
Defendants	:	
-----	X	

**NOTICE OF APPEARANCE AND REQUEST FOR NOTICES AND PAPERS ON  
BEHALF OF SHIELD SECURITIES LIMITED**

PLEASE TAKE NOTICE that Shield Securities Limited (“Shield”) hereby enters its appearance by and through their counsel, Freshfields Bruckhaus Deringer US LLP, pursuant to section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101 et seq. (the “Bankruptcy Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and that such party in interest hereby requests, pursuant to Bankruptcy Rules 2002 and 9007 and section 1109(b) of the Bankruptcy

Code, that copies of all notices and pleadings in these cases be given and served upon the undersigned representatives at the following address:

Caitrin Una McKiernan, Esq.  
Freshfields Bruckhaus Deringer US LLP  
601 Lexington Avenue, 31st Floor  
New York, NY 10022  
Telephone: (212) 277-4000  
Facsimile: (212) 277-4001  
caitrin.mckiernan@freshfields.com

PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise filed or given with regard to the above-referenced case and the proceedings therein.

Neither this Notice of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive any right of Shield: (i) to have final orders in non-core matters entered only after de novo review by a district judge; (ii) to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) to rights, claims, actions, defenses, setoffs or recoupments to which Shield may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved hereby.

Finally, neither this Notice of Appearance nor any subsequent appearance

or pleading shall be deemed to waive Shield's right to assert the defense of personal jurisdiction, which right is hereby expressly preserved.

Dated: New York, New York  
January 22, 2014

FRESHFIELDS BRUCKHAUS DERINGER  
US LLP

By: /s/ CAITRIN UNA MCKIERNAN  
Caitrin Una McKiernan

601 Lexington Avenue, 31st Floor  
New York, NY 10022  
Telephone: (212) 277-4000  
Facsimile: (212) 277-4001

Attorneys for Shield Securities Limited